

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION, a Washington
corporation,

Plaintiff,

v.

MOTOROLA, INC., and MOTOROLA
MOBILITY, INC., and GENERAL
INSTRUMENT CORPORATION,

Defendants.

CASE NO. C10-1823-JLR

DEFENDANTS' REPLY IN SUPPORT
OF MOTION TO FILE DOCUMENTS
UNDER SEAL RE: OPPOSITION TO
MICROSOFT'S MOTION FOR
PARTIAL SUMMARY JUDGMENT

**NOTED ON MOTION CALENDAR:
Friday, October 7, 2011**

DEFENDANTS' REPLY IN SUPPORT OF MOTION TO FILE
DOCUMENTS UNDER SEAL RE: OPPOSITION TO
MICROSOFT'S MOTION FOR PARTIAL SUMMARY
JUDGMENT
CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC
315 FIFTH AVENUE SOUTH, SUITE 1000
SEATTLE, WASHINGTON 98104-2682
Telephone: (206) 676-7000
Fax: (206) 676-7001

1 Because Motorola meets the standards for sealing as discussed in its moving brief and
2 because Microsoft does not oppose Motorola's motion to seal (ECF No. 85), Motorola respectfully
3 requests that the Court grant its motion to seal.

4 DATED this 7th day of October, 2011.

5 SUMMIT LAW GROUP PLLC

6 By /s/ Philip S. McCune

7 Philip S. McCune, WSBA #21081

8 Lynn M. Engel, WSBA #21934

9 *philm@summitlaw.com*

lynne@summitlaw.com

10 And by

11 Steven Pepe (*pro hac vice*)

Jesse J. Jenner (*pro hac vice*)

12 Stuart W. Yothers (*pro hac vice*)

Ropes & Gray LLP

13 1211 Avenue of the Americas

New York, NY 10036-8704

14 (212) 596-9046

steven.pepe@ropesgray.com

15 *jesse.jenner@ropesgray.com*

stuart.yothers@ropesgray.com

16 Norman H. Beamer (*pro hac vice*)

17 Gabrielle E. Higgins (*pro hac vice*)

Ropes & Gray LLP

18 1900 University Avenue, 6th Floor

East Palo Alto, CA 94303-2284

19 (650) 617-4030

norman.beamer@ropesgray.com

20 *gabrielle.higgins@ropesgray.com*

1 Paul M. Schoenhard (*pro hac vice*)
2 Kevin J. Post (*pro hac vice*)
3 Ropes & Gray LLP
4 One Metro Center
5 700 12th Street NW, Suite 900
6 Washington, DC 20005-3948
7 (202) 508-4693
8 *paul.schoenhard@ropesgray.com*
9 *kevin.post@ropesgray.com*

10 ***Attorneys for Defendants Motorola Solutions,***
11 ***Inc., Motorola Mobility, Inc., and General***
12 ***Instrument Corporation***
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Arthur W. Harrigan, Jr., Esq.
Christopher T. Wion, Esq.
Shane P. Cramer, Esq.
Danielson, Harrigan, Leyh & Tollefson LLP
arthurh@dhlt.com
chrisw@dhlt.com
shanec@dhlt.com

Brian R. Nester, Esq.
David T. Pritikin, Esq.
Douglas I. Lewis, Esq.
John W. McBride, Esq.
Kevin C. Wheeler, Esq.
Richard A. Cederoth, Esq.
Sidley Austin LLP
bnester@sidley.com
dpritikin@sidley.com
dilewis@sidley.com
jwmcbride@sidley.com
kwheeler@sidley.com
rcederoth@sidley.com

T. Andrew Culbert, Esq.
David E. Killough, Esq.
Microsoft Corp.
andycu@microsoft.com
davkill@microsoft.com

DATED this 7th day of October, 2011.

/s/ Marcia A. Ripley
Marcia A. Ripley